



United States Environmental Protection Agency  
Washington, D.C. 20460

## Water Compliance Inspection Report

### Section A: National Data System Coding (i.e., PCS)

Transaction Code	NDPES	yy/mm/dd	Inspection Type	Inspector	Fac Type
1 N	2	3 M A 0 1 0 1 0 1 0	11 12 0 9 0 5 2 8	17 18 C	19 J 20 1
Remarks					
21					
Inspection Work Days					
Facility Self-Monitoring Evaluation Rating					
B1					
QA					
Reserved					
67 2	69 0 0	70 3	71 N	72 N	73 74 75 80

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NDPES permit number) <b>BROCKTON AWRF: 303 OAK HILL WAY BROCKTON MA 02401</b>	Entry Time/Date 5/28/2009 9:30	Permit Effective Date 12/1/2006
	Exit Time/Date 5/28/2009 14:30	Permit Expiration Date 11/30/2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Robert Bacher PROJECT MANAGER *VEOLIA 508-580-7885, FAX 508-559-0760</b> <b>Ernie Perschino Assistant Project Manager (SIGNATOR ON DMR)</b> <b>DAVE NORTON (city of brockton)</b>	Other Facility Data Facility is currently in phase III upgrade construction. All secondary treatment is going thru sand filtration and new aqua-diamond filters. Another new aquadiamond is being installed.	
Name, Address of responsible Official/Title/Phone and Fax Number. <b>MICHAEL THORESON. COMMISSIONER DPW #508 580-7135, FAX: 508 580-7169</b> CITY HALL, 45 SCHOOL STREET, BROCKTON, MA 02301-9927	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

### Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

### Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

SEV Codes	SEV Description

note: due to licence reqmt Ernie Persechino or designee with grade 7 licence is the signator on the DMR's

Facility in final stages of upgrade, optimization of works is ongoing.

Note: issues with scum collection (transmission to unit) in north side final clarifiers. Working on this.

Primary clarifiers being optimised, sludge pumps are being replaced

Stormwater permit must re-apply with the promulgation of the new national general permit last fall.


Influent screens: work in that area needed& ongoing

Second aquadiamond filter is under construction slated to be on line in september '09

Name(s) and Signature(s) of Inspector(s) Joseph Shepherd David Burns Steve Couto	Agency/Office/Phone and Fax Numbers MADEP - SERO 508 946 2756 MaDEP - SERO 508 946 2738 USEPA, OES - SEW / 671-918-1765	Date 9/24/2009
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date tbh



5-4-06

		United States Environmental Protection Agency Washington, D.C. 20460	
<b>Water Compliance Inspection Report</b>			
Section A: National Data System Coding (i.e., PCS)			
Transaction Code	NPDES	yr/mo/day	Inspection Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/> 21 <input type="checkbox"/>	MA1100001127	09/05/08	18 <input type="checkbox"/>
Remarks			
Inspection Work Days			
67 <input type="checkbox"/> 68 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Self-Monitoring Evaluation Rating	BI	QA
	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>
Reserved			
73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 76 <input type="checkbox"/> 77 <input type="checkbox"/> 78 <input type="checkbox"/> 79 <input type="checkbox"/> 80 <input type="checkbox"/>			
Section B: Facility Data			
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Brockton WWTF 303 Oak Hill Way Brockton, MA 02301		Entry Time/Date	Permit Effective Date
		Exit Time/Date	Permit Expiration Date
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Robert Bacher, Project Mgr Veolia (508) 580-7885		Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number David Norton Contractor Administrator Water & Sewer 508/580-7885			
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)			
<input type="checkbox"/> Permit <input type="checkbox"/> Records/Reports <input type="checkbox"/> Facility Site Review <input type="checkbox"/> Effluent/Receiving Waters <input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Self-Monitoring Program <input type="checkbox"/> Compliance Schedules <input type="checkbox"/> Laboratory <input type="checkbox"/> Operations & Maintenance <input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Pollution Prevention <input checked="" type="checkbox"/> Storm Water <input type="checkbox"/> Combined Sewer Overflow <input type="checkbox"/> Sanitary Sewer Overflow	<input type="checkbox"/> MS4
Section D: Summary of Findings/Comments			
(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)			
SEV Codes	SEV Description		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3 of the CBs at the WWTF discharge to the river. An NOI was apparently submitted in 2003 and a SWPPP prepared but they are not listed as being covered by the MSGP. Told them that the MSGP was reissued in Sept 2008 and that they must submit a new NOI & update SWPPP.		
Name(s) and Signature(s) of Inspector(s)		Agency/Office/Phone and Fax Numbers	Date
Steven Couto		EPA/SEW 617/918-1765	6/1/09
Signature of Management Q A Reviewer		Agency/Office/Phone and Fax Numbers	Date



REPORT OF PHONE CALL  
VISIT

In \_\_\_\_\_ Out \_\_\_\_\_

File \_\_\_\_\_

Date 6/2/09 Time \_\_\_\_\_

Routing \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Person Contacted Dave Norton

Phone No. 508 586-7885

Location Brockton WWT F

Subject Follow up to inspection 5/28/09

Summary Need to reapply for coverage under  
the reissued MSGP - I will send him  
the web address - It should be on the  
material I left on 5/28/09.  
He is working on it now.

Action Required \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Steven Couto  
Signature



"Norton David"  
<dnorton@ci.brockton.ma.us>

06/02/2009 09:41 AM

To: Steven Couto/R1/USEPA/US@EPA  
cc  
bcc  
Subject: RE: E-NOI web address

Thanks Steven

David A. Norton  
City of Brockton  
Water & Sewer Contract Administrator  
303 Oak Hill Way  
Brockton, MA 02301

-----Original Message-----

From: couto.steven@epamail.epa.gov [mailto:couto.steven@epamail.epa.gov]

Sent: Tuesday, June 02, 2009 10:21 AM

To: Norton David

Subject: E-NOI web address

David:

Here is the website to apply for the reissued Multi-Sector General Permit for the Wastewater Treatment Plant

<http://cfpub.epa.gov/npdes/stormwater/enoi.cfm>



# Inspection Conclusion Data Sheet (ICDS)

FY2009

Inspector: Steven Couto

Inspection Date: 5/28/09

Facility Name and Address: Brockton WWT F 303 Oak Hill Way  
Brockton, MA 02301

Facility Manager/Title and Address (if different from above):  
David Norton, Contract Administrator,  
Water & Sewer

Facility Contact/Title and Address (if different from above):  
Robert Bacher, Project Mgr. Veolia

## 1. Media Type: (Check one)

- |                                          |                                                |                                                                        |
|------------------------------------------|------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> CAA-Stationary  | <input type="checkbox"/> CAA-Mobile Source     | <input type="checkbox"/> CAA-112r                                      |
| <input type="checkbox"/> CAA-NESHAP      |                                                |                                                                        |
| <input type="checkbox"/> CWA-NPDES       | <input type="checkbox"/> CWA-Pretreatment POTW | <input type="checkbox"/> CWA-Pretreatment IU                           |
| <input type="checkbox"/> CWA 311         | <input type="checkbox"/> CWA 404               | <input checked="" type="checkbox"/> CWA-Stormwater                     |
| <input type="checkbox"/> EPCRA 313       | <input type="checkbox"/> EPCRA N313            |                                                                        |
| <input type="checkbox"/> RCRA-C          | <input type="checkbox"/> RCRA-I                |                                                                        |
| <input type="checkbox"/> SDWA-UIC        | <input type="checkbox"/> SDWA-PWSS             |                                                                        |
| <input type="checkbox"/> TSCA-Lead Paint | <input type="checkbox"/> TSCA-PCBs             | <input type="checkbox"/> TSCA-Core <input type="checkbox"/> TSCA-AHERA |

## 2. Did you observe deficiencies (potential violations) during the inspection?

☒ Yes ☐ No Need to apply for new MSGP

## 3. If you observed deficiencies, did you communicate them to the facility during the inspection?

☒ Yes ☐ No

## 4. Deficiencies observed?

☐ Potential violation of a compliance schedule in an enforceable order.

☐ Potential failure to maintain a record or failure to disclose a document.

☐ Potential failure to maintain, inspect or repair equipment including meters, sensors, and recording equipment.

☐ Potential failure to complete or submit a notification, report, certification, or manifest.

☒ Potential failure to obtain a permit, product approval, or certification.



- \_\_\_\_ Potential failure to follow a required sampling or monitoring procedure or laboratory procedure.
- \_\_\_\_ Potential failure to follow or develop a required management practice or procedure.
- \_\_\_\_ Potential failure to identify and manage a regulated waste or pollutant in any media.
- \_\_\_\_ Potential failure to report regulated events such as spills, accidents, etc.
- \_\_\_\_ Potential incorrect use of a material (e.g., pesticide, waste, product, etc.) or use of improper or unapproved material.
- \_\_\_\_ Potential failure to follow a permit condition(s).

**5 Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated to the facility?**

☐ Yes ☒ No ☐ N/A only if #3 was NO.

If YES, check only the action(s) actually observed/seen or write in a short description of the action in the "optional" section. (Check all that apply)

**Action(s) taken**

- \_\_\_\_ Complete(d) a Notification or Report
- \_\_\_\_ Correct(ed) Monitoring Deficiencies
- \_\_\_\_ Correct(ed) Record Keeping Deficiencies
- \_\_\_\_ Implemented New or Improved Management Practices or Procedures
- \_\_\_\_ Improved Pollutant Identification (e.g., Labeling, Manifesting, Storage, etc.)
- \_\_\_\_ Reduced Pollution (e.g., Use Reduction, Industrial Process Change, Emissions or Discharge Change, etc.)
- \_\_\_\_ Request(ed) a Permit Application or Applied for a Permit
- \_\_\_\_ Verified Compliance with Previously Issued Enforcement Action - Part or All Conditions

The following common air or water pollutant(s) **should only be checked** if the "Reduced Pollution" line was checked.

**Water:** ☐ Ammonia ☐ BOD ☐ COD ☐ TSS ☐ O/G ☐ Total Coliform ☐ D.O.  
☐ Metals ☐ Cyanide ☐ Other \_\_\_\_\_

**Air:** ☐ NO<sub>x</sub> ☐ SO<sub>2</sub> ☐ PM ☐ VOC ☐ Metals ☐ HAPs ☐ CO  
☐ Other \_\_\_\_\_

**6. Did you provide general compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?**

☐ Yes ☒ No



**7. Did you provide site-specific compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?**

☐ Yes

☒ No

**Optional Additional Information:** EPA inspectors may wish to provide a narrative description of actions taken by the facility or assistance to help the facility come into compliance. (Narratives may be used in national or regional reports to provide examples of EPA inspection outcomes).

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"Norton David"  
<dnorton@ci.brockton.ma.us>  
s>

05/26/2009 12:31 PM

To "Shepherd, Joseph (DEP)"  
<Joseph.Shepherd@state.ma.us>, "Bacher, Robert"  
<Robert.Bacher@veoliawaturna.com>, "Burns, David (DEP)"  
cc "Persechino, Ernie"  
<ernest.persechino@veoliawaturna.com>, Steven  
Couto/R1/USEPA/US@EPA

bcc

Subject RE: Thursday plant tour Brockton

Hello Joe

As I mentioned previously, Thursday I need to be down at Silver Lake for the day pretty much wrapping up the WTF upgrade. I know you state "may/need discussion" but for items 1, 3, 4 & 6 you probably need to count on me and not Veolia. When I get a moment I will provide you with some updates.

Thanks

David A. Norton  
City of Brockton  
Water & Sewer Contract Administrator  
303 Oak Hill Way  
Brockton, MA 02301

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**From:** Shepherd, Joseph (DEP) [mailto:Joseph.Shepherd@state.ma.us]  
**Sent:** Tuesday, May 26, 2009 12:58 PM  
**To:** Bacher, Robert; Burns, David (DEP)  
**Cc:** Persechino, Ernie; Norton David; Couto.Steven@epamail.epa.gov  
**Subject:** RE: Thursday plant tour Brockton

Some of the issues which may/need to be discussed on Thursday

1. Construction status,punch list items and change orders
2. Staffing current list and shift breakdown
- 3.. Capital items/projects-potential Phase 4
4. O & M Manual status for upgraded facility
5. SPCC plan upgrades
6. Sewer rates and IMA issues (if any)
7. Facility maintenance system ,spare parts inventory etc

Hope to be onsite by 9:30am walk though maybe impacted by weather. If anyone has any other issues to be addressed , please communicate!

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**From:** Bacher, Robert [mailto:Robert.Bacher@veoliawaturna.com]  
**Sent:** Tuesday, May 26, 2009 8:26 AM  
**To:** Shepherd, Joseph (DEP); Burns, David (DEP)  
**Cc:** Persechino, Ernie  
**Subject:** Thursday plant tour Brockton  
**Importance:** High

First I apologize for not checking my voice mail. Due to my limited hearing I avoid the telephone like the plague.

Thursday will be fine, looking forward to seeing you.

Robert Bacher  
Project Manager  
Veolia Water North America-Northeast, LLC  
Brockton Advanced Reclamation Facility



303 Oak Hill Way  
Brockton, MA 02301  
508-580-7885 X 112  
508-559-0760 FAX  
[robert.bacher@veoliawaterna.com](mailto:robert.bacher@veoliawaterna.com)  
[www.veoliawaterna.com](http://www.veoliawaterna.com)

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**Shepherd, Joseph (DEP)**

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**From:** Norton David [dnorton@ci.brockton.ma.us]  
**Sent:** Tuesday, May 26, 2009 4:08 PM  
**To:** Shepherd, Joseph (DEP)  
**Subject:** RE: Thursday plant tour Brockton  
**Attachments:** Brockton AWRF Joe Shep.doc; Brockton Sewer & Water Rates.pdf; Brockton Phase 4 Possibilities.xls

Here you go - some updates. Excuse being lengthy plus all the attachments.  
Just to re-iterate, this ending upgrade would have been a whole lot easier if I had actual had a staff of WW Operators and a Contract Operator who thought more about the process and less about the bottom line.  
Have a good night.  
Thanks

David A. Norton  
City of Brockton  
Water & Sewer Contract Administrator

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**From:** Shepherd, Joseph (DEP) [mailto:Joseph.Shepherd@state.ma.us]  
**Sent:** Tue 5/26/2009 2:56 PM  
**To:** Norton David  
**Subject:** RE: Thursday plant tour Brockton  
I know you have some of the details, just trying to force them to be prepared!

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**From:** Norton David [mailto:dnorton@ci.brockton.ma.us]  
**Sent:** Tuesday, May 26, 2009 12:32 PM  
**To:** Shepherd, Joseph (DEP); Bacher, Robert; Burns, David (DEP)  
**Cc:** Persechino, Ernie; Couto.Steven@epamail.epa.gov  
**Subject:** RE: Thursday plant tour Brockton

Hello Joe  
As I mentioned previously, Thursday I need to be down at Silver Lake for the day pretty much wrapping up the WTF upgrade. I know you state "may/need discussion" but for items 1, 3, 4 & 6 you probably need to count on me and not Veolia. When I get a moment I will provide you with some updates.

Thanks  
David A. Norton  
City of Brockton  
Water & Sewer Contract Administrator  
303 Oak Hill Way  
Brockton, MA 02301



# Brockton AWRF Stimulus/SRF Projects List

			(Upgrade Incinerator)	(New Incinerator)		
Incinerator Mods/Upgrades					Incinerator Mods/Upgrades	
Task	Est Cost	Could be Defered	\$5 - 6mm List	\$10 - 12mm List	Task	
Venturi PAK Scrubber	\$ 2,689,750				Venturi PAK Scrubber	
Flue Gas Recirculation					Flue Gas Recirculation	
Control Repair&Replace		NO	\$ 2,689,750		Control Repair&Replace	
Control Upgrades					Control Upgrades	
Engineering & Install					Engineering & Install	
Contingency 10%	268,975	NO	\$ 268,975		Contingency 10%	
Sludge Hauling	\$ 250,000	NO	\$ 250,000	????????	Sludge Hauling	
(During Mods of Incinerator)					(During Mods of Incinerator)	
Replace Screw Conveyors with Belt Type	\$ 150,000.00	NO	\$ 150,000.00		Replace Screw Conveyors with Belt Type	
Sub Total						
AWRF General Improvements					AWRF General Improvements	
Task	Est Cost				Task	
2nd Lime Slaker	\$ 85,000	NO	\$ 85,000		2nd Lime Slaker	
Influent Screenings Improvements	\$ 750,000	NO / YES	\$ 750,000		Influent Screenings Improvements	
Replacement of # 225 Main Influent Q Meter	\$ 55,000	NO	\$ 55,000		Replacement of # 225 Main Influent Q Meter	
Mast Lighting Improvements	\$ 75,000	YES			Mast Lighting Improvements	
UV Area Canopy Walls		\$ 160,000	Phase 3 PCO		UV Area Canopy Walls	
Hot Water Supply PS Pump Station		Urgent - Need Now	or P4 \$ 125,000	\$ 125,000	Hot Water Supply PS Pump Station	
Scum Receiving Facility Upgrade	\$ 90,000	YES			Scum Receiving Facility Upgrade	
PC Tank Covers @ Scum & Railings		Urgent - Need Now	or P4 \$ 50,000	\$ 50,000	PC Tank Covers @ Scum & Railings	
Security - Camera's, Main Gate & Bldgs	\$ 200,000	NO	\$ 200,000	\$ 200,000	Security - Camera's, Main Gate & Bldgs	
Neuros Blowers (Replace Hibon Units)	\$ 650,000	Should not be			Neuros Blowers (Replace Hibon Units)	
Biochem On-Line Monitoring System	\$ 300,000	YES			Biochem On-Line Monitoring System	
Correct Deficiencies @ South AB's N-Removal	\$ 350,000	YES			Correct Deficiencies @ South AB's N-Removal	
Screwsucker Portable Pump	\$ 65,000	YES			Screwsucker Portable Pump	
Pick Up Truck	\$ 30,000	YES			Pick Up Truck	
Aqua Diamond Effluent Filters (2) @ \$1.5mm each	\$ 3,000,000	YES			Aqua Diamond Effluent Filters @ \$1.5mm each	
Incinerator Replacement - FBR (Standard) 25 DT/Day	\$ 10,000,000	YES ???		\$ 11,000,000	Incinerator Replacement - FBR (Standard) 25 DT/Day	
Incinerator Replacement - FBR (Thermylis) 25 DT/Day	\$ 15,000,000	YES ???			Incinerator Replacement - FBR (Thermylis) 25 DT/Day	
Sub Total						
Main Admin Bldg Upgrades					Main Admin Bldg Upgrades	
Task	Est Cost				Task	
ADA Compliance	\$ 250,000	NO	\$ 250,000	\$ 250,000	ADA Compliance	
(Elevator, other needed compliance items)					(Elevator, other needed compliance items)	
HVAC Upgrade	\$ 200,000	NO	\$ 200,000		HVAC Upgrade	
(AC Unit Chiller & other base units)					(AC Unit Chiller & other base units)	
Refurbish Lab & Equipment	\$ 150,000	NO	\$ 150,000		Refurbish Lab & Equipment	
(Cabinets, equipment)					(Cabinets, equipment)	
Second Floor Locker Area & Lunch Room	\$ 200,000	NO	\$ 200,000		Second Floor Locker Area & Lunch Room	
(Linked to BB Demo, Enlarge Locker Room or Just a refurbish/upgrade)					(Linked to BB Demo, Enlarge Locker Room or Just a refurbish/upgrade)	
Control Room Upgrades	\$ 210,000	NO	\$ 210,000		Control Room Upgrades	
(Demo BB System, new console, organize new)					(Demo BB System, new console, organize new)	
Locker Room Refurbish - Electricians	\$ 50,000	NO	\$ 50,000		Locker Room Refurbish - Electricians	
(Bathroom, shower, ceilings)					(Bathroom, shower, ceilings)	
Office Area	\$ 50,000	YES			Office Area	
Sub Total			\$ 5,683,725	\$ 11,625,000	Sub Total	
Total 3 Sections Above						
GS - Bidding & Construction + CM RE @ 10%			\$ 568,373	\$ 1,162,500	GS - Bidding & Construction & Some RE CM @ 10%	
Grand Total			\$ 6,252,098	\$ 12,787,500	Grand Total	



## **Brockton AWRF**

### **Construction Status, Punch List Items & Change Orders**

#### **Phase 2**

There are no punch list items remaining nor change orders for Walsh to accomplish. All that remains is for a final negotiation of cost of a few change orders already done by Walsh and then a Final Close Out Balancing Change Order. BTW – the staff will soon be completing our 4<sup>th</sup> experiment on ensuring we can keep the scum from the scum-trough on the North SC's moving. They have kind of lost focus and I will soon be getting them back on track.

#### **Phase 3**

I believe there are approximately 40 punch list items remaining. A few of the biggies worth mentioning are the new DiaDisk Double Disk Primary Sludge Pumps which we are currently concerned they are not right for the application. We are testing them Friday to prove or disprove the Vendor has satisfactorily satisfied the spec. That way if he satisfies the spec he walks away free (seeing CDM wrote a weak spec) or if he fails at least it will be cheaper for the City to install something which will work. We are sure glad we kept two of our Watson Marlow piston pumps. Other than some lingering SCADA stuff it would be appear to be mostly Electrical Testing and some drawings, etc.....As for change orders there are two very big ones the be started and are planned for June/July, those being the second Aqua Diamond Filter & the Addition of Walls at the UV Canopy. There are two new quickie change orders we are working on which are a Lawn/Farm Tractor with a large mowing deck for maintaining the facility grounds as currently one man rides a little lawnmower 5days/week 8 hours/day and can not keep up. Seeing Veolia has a Mechanic provide this function it would seem better to reduce his time on lawn maintenance. The other change order is for the Re-Stripping of the parking lot and same asphalt work which CDM missed. Other than those I am having trouble recalling if there are any outstanding ones to complete and there remains only negotiations of the completed. Chris Sharpe is now gone from Brockton and is on assignment in Wareham on the pipe replacement job.

### **Capital Projects – Potential Phase 4**

This list could change based on a few factors. Somehow our IUP for WW came in at \$11mm where it had been hoped to be \$20mm. Especially seeing it could be ARRA money. Too long a story but after speaking with Jack Hamm we will either get the guaranteed \$4.8mm or that plus an added \$5-6mm. Base on this we have two scope list under consideration.

#### **Capital Projects City**

No money in the budget this coming year for that list but feel the plant is in very good shape.

#### **Potential Phase 4**

Under Consideration for the \$4.8mm are: I have attached the excel spreadsheet for your review. As you will see there is a \$5-6+mm list because we estimated to have a "leftover" from SRF + STAG money in the \$1-2+mm range. Plus a \$11-12mm list.



As for the \$11-12mm list. I know you feel strongly about beneficial re-use but based on the actual numbers and projections for sludge production due to P removal I am suggesting to the City if the additional money can be found that they consider a Pyrofluid FBR (or something similar) at a rated capacity of 20-25 dt/day. The existing incinerator even with an upgrade WILL NOT have enough capacity to handle the AWRP's sludge be it current or future. That would mean limiting the feed to the incinerator for maintaining permit compliance while transporting the remaining cake to the on-site landfill (bad idea) or pay to have hauled (a very expensive idea). It makes more sense to look at the newer incinerators which have super emissions quality, hugely reduce gas usage, lower maintenance cost and also being able to incorporate COGEN or some other form of energy creation.

We can discuss further at your convenience.

### **O&M Manual Status**

As you may recall, the City has paid CDM quite handsomely for the creation and formation of a state of the art O&M Manual which incorporates the facility upgrades as well as the remaining processes. As recently as a month ago the Commissioner and I put CDM on notice for failing to provide this task in a timely manner and also stating to them the expectation was for them to have completed BEFORE we were fully on line with the upgrade complete. FAILED!! We have requested a presentation as to where it stands for a status and were asked by them to give them a month and they should have it in better shape. The month is up this week I believe so I will be contacting them soon. I do get a spreadsheet list each week from CDM which updates their progress (or lack thereof) and on last review I would say they may be only half way to completion.

### **Sewer Rates & IMA's**

Sewer Rates – I have attached the current Water & Sewer Rate Sheets. Note we have another increase planned for 1/1/2010.

IMA's

The Abington Amendment #4 remains un-executed and last I had heard was not being looked upon highly by them as it firmed up language as well as gave the City leverage & teeth. Abington continues to average above the 1mgd and continues to be under a City of Brockton DPW Commissioner moratorium.

As for Whitman – nothing much to say at the moment. You know the story on them. They have their own agenda. Did you ever see an I&I report from them? With the new NPDES you should have seen at least two.

PS – If I missed anything it was purely unintentional. If so, I prefer to claim insanity as things are pure crazy at the moment.

Talk to you guys soon. Make sure to take note of the new lobby sign when you're there!



**City of Brockton  
Department of Public Utilities  
Utilities Division**

*update 4/09*

**Rates per 100 cubic feet**

<b>Date</b>	<b>Water</b>	<b>Sewer</b>					
<b>Semi Annual:</b>							
<i>Water rate increase</i> 7/1/81	.80 *	.25					
<i>water rate increase</i> 1/1/82	1.00 *	.25					
<i>sewer rate increase</i> 7/1/84	1.00	1.00 *					
<i>water rate increase</i> 1/1/89	1.35 *	1.00					
<i>water rate increase</i> 7/1/89	1.45 *	1.00					
<i>sewer rate increase</i> 1/1/90	1.45	1.40 *					
<i>water rate increase</i> 1/1/91	1.70 *	1.40					
<i>sewer rate increase</i> 1/1/92	1.70	1.65 *					
<b>Quarterly:</b>	<b>2,500</b>	<b>5,000</b>	<b>10,000</b>	<b>25,000</b>	<b>875,000</b>	<b>875,000+</b>	
<i>sewer rate increase</i> 7/1/92	1.70 non - block						
Water *	1.65	2.05	2.40	2.75	3.00		
Sewer *							
<i>water rate increase</i> 1/1/93	1.70	2.25	2.35	2.45	2.50		
Water *	1.65	2.05	2.40	2.75	3.00		
Sewer *							
<i>water rate increase</i> 1/1/94	1.80	2.35	2.45	2.55	2.60		
Water *	1.65	2.05	2.40	2.75	3.00		
Sewer *							
<i>sewer rate increase</i> 7/1/96	1.80	2.35	2.45	2.55	2.60		
Water *	1.72	2.15	2.52	2.89	3.15		3.35
Sewer *							
<i>sewer rate increase</i> 7/1/99	1.80	2.35	2.45	2.55	2.60		
Water *	1.79	2.24	2.63	3.01	3.28		3.80
Sewer *							
<i>water rate increase</i> 7/1/04	1,250	2,500	5,000	10,000	25,000	875,000	875,000+
Water *	1.70	2.16	2.94	3.06	3.19	3.32	3.32
Sewer *	1.79	1.79	2.24	2.63	3.01	3.28	3.80
<i>sewer rate increase</i> 1/1/05	1,250	2,500	5,000	10,000	25,000	875,000	875,000+
Water *	1.70	2.16	2.94	3.06	3.19	3.32	3.32
Sewer *	1.92	1.92	2.40	2.81	3.28	3.84	4.83
<i>sewer rate increase</i> 1/1/06	1,250	2,500	5,000	10,000	25,000	875,000	875,000+
Water *	1.70	2.16	2.94	3.06	3.19	3.32	3.32
Sewer *	2.02	2.02	2.52	2.95	3.44	4.03	5.07
<i>water rate increase</i> 7/1/06	1,250	2,500	5,000	10,000	25,000	875,000	875,000+
Water *	1.87	2.38	3.23	3.51	3.67	3.82	3.82
Sewer *	2.02	2.02	2.52	2.95	3.44	4.03	5.07
<i>sewer rate increase</i> 1/1/07	1,250	2,500	5,000	10,000	25,000	875,000	875,000+
Water *	1.87	2.38	3.23	3.51	3.67	3.82	3.82
Sewer *	2.53	2.53	3.37	4.48	5.97	7.92	10.53



<i>sewer rate increase</i>	<i>1,250</i>	<i>2,500</i>	<i>5,000</i>	<i>10,000</i>	<i>25,000</i>	<i>875,000</i>	<i>875,000+</i>
Water	1.87	2.38	3.23	3.51	3.67	3.82	3.82
1/1/08 Sewer *	2.66	2.66	3.54	4.70	6.27	8.32	11.06
<i>water rate increase</i>	<i>1,250</i>	<i>2,500</i>	<i>5,000</i>	<i>10,000</i>	<i>25,000</i>	<i>875,000</i>	<i>875,000+</i>
7/1/08 Water *	2.99	3.81	5.17	5.62	5.87	6.11	6.11
Sewer	2.66	2.66	3.54	4.70	6.27	8.32	11.06
<i>sewer rate increase</i>	<i>1,250</i>	<i>2,500</i>	<i>5,000</i>	<i>10,000</i>	<i>25,000</i>	<i>875,000</i>	<i>875,000+</i>
1/1/09 Water	2.99	3.81	5.17	5.62	5.87	6.11	6.11
Sewer *	2.93	3.72	4.96	6.58	8.78	11.65	15.48
<i>sewer rate increase</i>	<i>1,250</i>	<i>2,500</i>	<i>5,000</i>	<i>10,000</i>	<i>25,000</i>	<i>875,000</i>	<i>875,000+</i>
1/1/10 Water	2.99	3.81	5.17	5.62	5.87	6.11	6.11
Sewer *	2.93	3.91	5.20	6.91	9.22	12.23	16.26

Meter Size	Water Allowance (quarterly)
5/8" and 3/4".....	750
1".....	1,875
1 1/4" and 1 1/2".....	3,750
2".....	6,000
3".....	12,000

Meter Size	Water Allowance (quarterly)
4".....	18,750
6".....	37,500
8".....	86,250
10".....	142,500
12".....	217,500

\* increase in rate



Inspection Conclusion Data Sheet (ICDS)

FY2008

Inspector: Steven Couto

Inspection Date: 5/13/08

Facility Name/Address: Brockton WWTF 303 Oak Hill Way  
Brockton, MA 02301

Facility Manager/Title and Address (if different from above): David Norton, Contract Administrator Water & Sewer

Facility Contact/Title and Address (if different from above): Robert Bachier, Project Mgr

1. Media Type: (Check one)

- |                                             |                                                |                                                                        |
|---------------------------------------------|------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> CAA-Stationary     | <input type="checkbox"/> CAA-Mobile Source     | <input type="checkbox"/> CAA-112r                                      |
| <input type="checkbox"/> CWA-NPDES          | <input type="checkbox"/> CWA-Pretreatment POTW | <input type="checkbox"/> CWA-Pretreatment IU                           |
| <input checked="" type="checkbox"/> CWA 311 | <input type="checkbox"/> CWA 404               | <input checked="" type="checkbox"/> CWA-Stormwater                     |
| <input type="checkbox"/> EPCRA 313          | <input type="checkbox"/> EPCRA N313            |                                                                        |
| <input type="checkbox"/> RCRA-C             | <input type="checkbox"/> RCRA-I                |                                                                        |
| <input type="checkbox"/> SDWA-UIC           | <input type="checkbox"/> SDWA-PWSS             |                                                                        |
| <input type="checkbox"/> TSCA-Lead Paint    | <input type="checkbox"/> TSCA-PCBs             | <input type="checkbox"/> TSCA-Core <input type="checkbox"/> TSCA-AHERA |

2. Did you observe deficiencies (potential violations) during the inspection?

☒ Yes ☐ No SPCC Plan missing some oil storage drums & tanks

3. If you observed deficiencies, did you communicate them to the facility during the inspection?

☒ Yes ☐ No

4. Deficiencies observed?

- ☐ Potential violation of a compliance schedule in an enforceable order.
- ☐ Potential failure to maintain a record or failure to disclose a document.
- ☐ Potential failure to maintain, inspect or repair equipment including meters, sensors, and recording equipment.
- ☐ Potential failure to complete or submit a notification, report, certification, or manifest.
- ☐ Potential failure to obtain a permit, product approval, or certification.



- \_\_\_\_ Potential failure to follow a required sampling or monitoring procedure or laboratory procedure.
- \_\_\_\_ Potential failure to follow or develop a required management practice or procedure.
- \_\_\_\_ Potential failure to identify and manage a regulated waste or pollutant in any media.
- \_\_\_\_ Potential failure to report regulated events such as spills, accidents, etc.
- \_\_\_\_ Potential incorrect use of a material (e.g., pesticide, waste, product, etc.) or use of improper or unapproved material.
- \_\_\_\_ Potential failure to follow a permit condition(s).

**5 Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated to the facility?**

☒ Yes    ☐ No    ☐ N/A only if #3 was NO.

If YES, check only the action(s) actually observed/seen or write in a short description of the action in the "optional" section. (Check all that apply)

**Action(s) taken**

- \_\_\_\_ Complete(d) a Notification or Report
- \_\_\_\_ Correct(ed) Monitoring Deficiencies
- \_\_\_\_ Correct(ed) Record Keeping Deficiencies
- \_\_\_\_ Implemented New or Improved Management Practices or Procedures
- \_\_\_\_ Improved Pollutant Identification (e.g., Labeling, Manifesting, Storage, etc.)
- \_\_\_\_ Reduced Pollution (e.g., Use Reduction, Industrial Process Change, Emissions or Discharge Change, etc.)
- \_\_\_\_ Request(ed) a Permit Application or Applied for a Permit
- \_\_\_\_ Verified Compliance with Previously Issued Enforcement Action - Part or All Conditions

*They will have their  
P.E. include the  
missing oil storage drums  
and tanks.*

The following common air or water pollutant(s) **should only be checked** if the "Reduced Pollution" line was checked.

**Water:**    ☐ Ammonia    ☐ BOD    ☐ COD    ☐ TSS    ☐ O/G    ☐ Total Coliform    ☐ D.O.  
               ☐ Metals    ☐ Cyanide    ☐ Other \_\_\_\_\_

**Air:**    ☐ NO<sub>x</sub>    ☐ SO<sub>2</sub>    ☐ PM    ☐ VOC    ☐ Metals    ☐ HAPs    ☐ CO  
               ☐ Other \_\_\_\_\_

**6. Did you provide general compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?**

☒ Yes    ☐ No



7. Did you provide site-specific compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?

☒ Yes

☐ No

**Optional Additional Information:** EPA inspectors may wish to provide a narrative description of actions taken by the facility or assistance to help the facility come into compliance.

(Narratives may be used in national or regional reports to provide examples of EPA inspection outcomes).

SPCC Plan needs to include some oil drums & tanks that were not included.

Facility needs to apply for MSGP coverage when the MSGP is reissued.



United States Environmental Protection Agency  
Washington, D.C. 20460

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES		yr/mo/day		Inspection Type		Inspector		Fac Type		
1	N	2	5	3	MIAW01011217	11		12	080513	17		
Remarks												
21												
Inspection Work Days												
67				Facility Self-Monitoring Evaluation Rating				Reserved				
69				70			71			72		
80												

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)

Entry Time/Date

Permit Effective Date

Brockton WWTF  
303 Oak Hill Way  
Brockton, MA 02301

Exit Time/Date

Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

David Norton, Contract Admin. Water  
& Sewer

Robert Bacher, Project Mgr.

Other Facility Data (e.g., SIC NAICS, and other descriptive information)

All CBs have filter socks due to construction at POTW

Name, Address of Responsible Official/Title/Phone and Fax Number

David Norton  
(508) 580-7885

**Contacted**

☒ Yes ☐ No

MSGP is for 3 of the CBs that discharge to the river.

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

Permit	Self-Monitoring Program	Pretreatment	MS4
<b>Records/Reports</b>	Compliance Schedules	Pollution Prevention	
Facility Site Review	Laboratory	<input checked="" type="checkbox"/> Storm Water	
Effluent/Receiving Waters	Operations & Maintenance	Combined Sewer Overflow	
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow	

## Section D: Summary of Findings/Comments

*(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)*

SEV Codes	SEV Description
000000	An NOI was apparently submitted in 2003 and a SWPPP prepared.
000000	Informed them that their NOI was not recorded and they are not listed as being covered by the MSGP. They can reapply for coverage when the MSGP is reissued.

Name(s) and Signature(s) of Inspector(s)

Agency/Office/Phone and Fax Numbers

Date \_\_\_\_\_

Steven Couto

EPA/SEW 617/98-1765

5/13/08

Signature of Management Q A Reviewer

Agency/Office/Phone and Fax Numbers

Date \_\_\_\_\_



# INSTRUCTIONS

## Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the lead agency in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

## Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

## Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

## Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.





"Roy, Gregory"  
<RoyG@cdm.com>  
09/07/2006 07:35 AM

To Steven Couto/R1/USEPA/US@EPA  
cc Norton David <dnorton@ci.brockton.ma.us>, "Hoar, John"  
<HoarJM@cdm.com>  
bcc  
Subject Brockton WWTF SWPPP

Hi Steve,

As requested, I have enclosed documents showing that the Brockton SWPPP was created and sent to EPA in Washington. The enclosed PDF has the transmittal letter, Notice of Intent, and table of contents for the SWPPP. I assume this satisfies your request? I hope you are aware that the WWTF operator is following the requirements of this SWPPP.

Regarding SPCC .... My understanding is that there will be no comments from EPA regarding the SPCC requirements and we should proceed with finalizing the document. Please confirm that this is accurate.

Thanks,  
Greg

<<DOC090706.pdf>>

*Gregory A. Roy*

**CDM**

One Cambridge Place  
50 Hampshire Street  
Cambridge, MA 02139  
phone: (617) 452-6644  
fax: (617) 452-8644  
cell: (508) 878-7322



DOC090706.pdf





One Cambridge Place, 50 Hampshire Street  
Cambridge, Massachusetts 02139  
tel: 617 452-6000  
fax: 617 452-8000

March 7, 2003

Storm Water Notice of Intent  
EPA East Building, Rm. 7420  
1201 Constitution Avenue, NW  
Washington, DC 20004

Subject: Brockton Advanced Water Reclamation Facility SWPPP

To Whom It May Concern:

Enclosed is the Notice of Intent for the Brockton Advanced Water Reclamation Facility (and Residuals Landfill) located in Brockton, MA. The Facility intends to be authorized to discharge stormwater under the Multi-Sector General Permit. A Stormwater Pollution Prevention Plan has been prepared for the facility and is available at appropriate locations.

Very truly yours,

Carolyn Gilbert  
Camp Dresser & McKee Inc.

cc: Robert Smith, City of Brockton  
Craig Young, City of Brockton  
Michael Curtin, City of Brockton  
Hubert Spurway, US Filter  
Greg Roy, CDM  
Patrick Hughes, CDM

Document code



Notice of Intent for Storm Water Discharges Associated with  
INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entity in Section B intends to be authorized to discharge pollutants to waters of the United States, from the facility or site identified in Section C, under EPA's Storm Water Multi-sector General Permit (MSGP). Submission of the NOI also constitutes notice that the party identified in Section B of this form has read, understands, and meets the eligibility conditions of Part I of the MSGP; agrees to comply with all applicable terms and conditions of the MSGP; understands that continued authorization under the MSGP is contingent on maintaining eligibility for coverage, and that implementation of the permittee's pollution prevention plan is required two days after a complete NOI is mailed. In order to be granted coverage, all information required on this form must be completed. Please read and make sure you comply with all permit requirements, including the requirement to prepare and implement a storm water pollution prevention plan.

## A. Permit Selection

If new, enter generic permit, otherwise enter previous permit: MA1405X11111New Permit Number (EPA Use Only)  
    R05    

## B. Facility Operator Information

1. Name: WIS ILLINOIS 2. Phone: 6181981078RIS  
3. Mailing Address: a. Street or P.O. Box: 5013101AKI ILLINOIS  
b. City: BROOKFIELD c. State: IL d. Zip Code: 61213011

## C. Facility/Site Information

1. Facility/Site Name: BROOKFIELD INDUSTRIAL WASTE TREATMENT FACILITY  
2. Location Address: a. Street: 5013101AKI ILLINOIS  
b. City: BROOKFIELD c. County: PIKE  
d. State: IL e. Zip Code: 61213011 f. Latitude: 41.208119 g. Longitude: -171.100218  
3. If you are filing as a co-permittee, enter storm water general permit number:                       
4. a. Permit Applicant: ☐ Federal ☐ State ☐ Tribal ☐ Private ☒ Other public entity  
b. Is the facility located on Indian Country Lands? ☐ Yes ☒ No  
5. Does the facility discharge storm water into:  
a. Receiving water(s)? ☒ Yes ☐ No If yes, name(s) of receiving water(s): Edson Brook and  
b. A municipal separate storm sewer system (MS4)? ☐ Yes ☒ No  
If yes, name of the MS4 operator: SAINT LOUIS RIVER  
6. The 4-digit Standard Industrial Classification (SIC) codes or the 2-letter Activity Codes that best represent the principal products produced or services rendered by your facility and major co-located activities:  
Primary: 1111 Secondary (if applicable): 1111

7. Applicable sector(s) of industrial activity, as designated in Part 1.2.1 of the MSGP, that include associated discharges that you seek to have covered under this permit (choose up to three):

<input type="checkbox"/> Sector A	<input type="checkbox"/> Sector F	<input type="checkbox"/> Sector K	<input type="checkbox"/> Sector P	<input type="checkbox"/> Sector U	<input type="checkbox"/> Sector Z
<input type="checkbox"/> Sector B	<input type="checkbox"/> Sector G	<input checked="" type="checkbox"/> Sector L	<input type="checkbox"/> Sector Q	<input type="checkbox"/> Sector V	<input type="checkbox"/> Sector AA
<input type="checkbox"/> Sector C	<input type="checkbox"/> Sector H	<input type="checkbox"/> Sector M	<input type="checkbox"/> Sector R	<input type="checkbox"/> Sector W	<input type="checkbox"/> Sector AB
<input type="checkbox"/> Sector D	<input type="checkbox"/> Sector I	<input type="checkbox"/> Sector N	<input type="checkbox"/> Sector S	<input type="checkbox"/> Sector X	<input type="checkbox"/> Sector AC
<input type="checkbox"/> Sector E	<input type="checkbox"/> Sector J	<input type="checkbox"/> Sector O	<input checked="" type="checkbox"/> Sector T	<input type="checkbox"/> Sector Y	<input type="checkbox"/> Sector AD

## 8. Additional Facility/Site Requirements:

a. Based on the instructions provided in Addendum A of the MSGP, have the eligibility criteria for "listed species" and critical habitat been met? ☒ Yes ☐ No  
b. Based on the instructions provided in Addendum B of the MSGP, have the eligibility criteria for protection of historic properties been met? ☒ Yes ☐ No

## D. Certification

Do you certify under penalty of law that this document and all attachments were prepared under your direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted? Based on your inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, do you certify that the information submitted is, to the best of your knowledge and belief, true, accurate, and complete? Do you certify that you are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations?

Print Name: ROBERT D. PRUITTSignature: Robert D. PruittDate: 02/01/2012



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United States Environmental Protection Agency  
Washington, D.C. 20460

Form Approved.  
OMB No. 2040-0057  
Approval expires 10-31-95

## Water Compliance Inspection Report

### Section A: National Data System Coding (i.e., PCS)

Transaction Code	NDPES	yy/mm/dd	Inspection Type	Inspector	Fac Type
1 N 2 5 3 M A 0 1 0 1 0 1 0 11 12 0 1 1 0 1 0 17 18 S 19 R 20 1					
Remarks					
21 s a m p l i n g o n S e p t 2 6 t o 2 7 2 0 0 1 66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved	
67 69 70 71 N 72 73 74 75 80					

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NDPES permit number) City of Brockton WWTP 303 Oak Hill Way Brockton, MA 02401	Entry Time/Date 900 AM Oct 10, 2001	Permit Effective Date October 26, 1994
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Pat Flynn / Head Operator / 508 580-7885 John Kazlauskas / Project Manager / 508 580-7885	Exit Time/Date 400 PM Oct 10, 2001	Permit Expiration Date October 26, 1998
Other Facility Data		
Name, Address of responsible Official/Title/Phone and Fax Number. John Kazlauskas (US Filter operated) Same as above contacted yes Bob Smith / DPW Commissioner contacted NO Contacted <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

### Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (sewer Overflow)
<input type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

### Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

Facility operated by US Filter under contract with City of Brockton  
Plant design flow 18 MGD with peak of 36 MGD, currently 17 - 18 MGD  
Some foam on river from discharge extending ~50 feet downstream and <1/4 thick in clumps, step cascade aeration on effluent creates foam  
June 15, 2001 ferrous chloride spill (est. 200-300 gal) to ground and then to storm drain to river, cleaned up by diluting with water to storm drain. NOT reported  
Dead grass in area (11' by 65') of spill, new loam and grass seed but minimal growth, pH paper test of soil & water detected pH < 1 to pH 3 in soil at spill area  
August 31, 2001 ferrous chloride spill (est. 10 gal) to dike area from over filling storage tank, dike area contained rain water and both pumped to paved ground and ran down 2 storm drains to river, paved area washed down storm drain, very visible orange stains on pavement to storm drains. Reported to EPA  
5 gal plastic pail 1/2 full of 2,5 -D herbicide leaking on floor of "telephone" / "electric" room of building # 12. Floor stain area ~ 3' by 5'  
sludge leaking outside under berm area, sludge was <1/4 inch thick in area 3' by 5', during rain area would drain to storm water drain to river  
Main pump station wet well area has surcharged and walkway covered with 6 inches of solids  
Flow reported by using hourly instantaneous measurements that are averaged, There are no totalizers on influent mag meters and 1 of the 2 parshall flumes  
Some dewatered sludge on conveyor by passes route to incinerator and is collected in truck and disposed in onsite landfill, about 1 truck load is generated every 1-2 weeks and disposed in the landfill, the truck was almost full of dewatered sludge during the inspection  
Empty polymer totes are stored outside, 17 old drums were stored outside and 7 of them were missing bungs and had old polymer/rain water in them  
containment dike for 8000 gal sodium hypochlorite (12-13%) tank has drain to sewer, drain valve broken in open position

Name(s) and Signature(s) of Inspector(s) Daniel S. Granz	Agency/Office/Phone and Fax Numbers USEPA, OEME, EIA / 617 918-8358	Date Oct. 10, 2001
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date